



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 16 2018

REPLY TO THE ATTENTION OF:


ATTORNEY/CLIENT PRIVILEGE

MEMORANDUM

SUBJECT: Justification to Issue a Section 114 Request for Information to Solutia, Inc. (A Wholly Owned Subsidiary of Eastman Chemical Company), Sauget, Illinois

FROM: Sarah Clark, Environmental Engineer
Air Enforcement and Compliance Assurance Section (IL/IN)

Victoria Nelson, Environmental Engineer
Air Enforcement and Compliance Assurance Section (MI/WI)

THRU: Nathan Frank, Chief 
Air Enforcement and Compliance Assurance Section (IL/IN)

TO: John Matson, Associate Regional Counsel
Office of Regional Counsel

Solutia's W.G. Krummrich Plant has a Title V permit and is subject to 40 C.F.R. Part 63, Subpart FFFF: NESHAP for Miscellaneous Organic Chemical Manufacturing. After notifying IEPA, U.S. EPA inspected the facility on July 26, 2017. Solutia staff discussed two incidents that the facility addressed in January 2017 in which methyl isobutyl ketone (MIBK) were released: a burst reactor rupture disk and a failed valve on the line that recycles stripper effluent to the feed tank (decant tank). The failed valve allowed untreated MIBK-laden wastewater to bypass the stripper and discharge to the sewer. A letter sent by Solutia to the local POTW on February 1, 2017, and shared with EPA post-inspection, indicated that this issue was first recognized by the POTW and persisted for weeks before the cause of the discharge, the failed valve, was identified and repaired. The letter mentioned that Solutia experienced two additional spills in December 2016 due to "weather/freeze conditions." EPA separately inspected the POTW who reported 24 tons of MIBK air emissions for December 2016 and January 2017 combined, compared to a normal emission rate of approximately 0.1 tons, or less, of MIBK per month. Through this information request we will investigate these malfunctions, spills, and leaks and the preventative and corrective actions taken by Solutia to address them. Additionally, we will evaluate the operational and working practices at Solutia to determine whether the W.G. Krummrich Plant is in compliance with its permit and NESHAP Subpart FFFF.

This information request does not require emissions testing or sampling.

I certify that I have created a hard copy file for this investigation.